

JASON M. FRIERSON
 United States Attorney
 Nevada Bar No. 7709
 MICHAEL J. MULLEN
 Special Assistant United States Attorney
 Washington Bar No. 54288
 Office of the General Counsel
 Social Security Administration
 6401 Security Boulevard
 Baltimore, MD 21235
 Telephone: (206) 615-2748
 Facsimile: (206) 615-2531
 E-Mail: michael.j.mullen@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANA MARIA RUBIO,

Plaintiff,

v.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,

Defendant.

Case No.: 3:23-cv-00399-CSD

**DEFENDANT’S UNOPPOSED MOTION
 FOR EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff’s Motion to Remand (Dkt. No. 11, filed on December 15, 2023), currently due on January 14, 2024, by 30 days, through and including February 13, 2024. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant’s first request for an extension of time. Good cause exists for this extension due to Defendant’s counsel’s workload, as described below. In the span of four workdays,

1 Defendant's counsel has four briefing deadlines, including this matter. Although counsel has exercised
2 due diligence, the requested additional time is necessary.

3 Additional time is required to review the record, evaluate the issues raised in Plaintiff's
4 motion, determine whether options exist for settlement, and if not, prepare Defendant's response to
5 Plaintiff's motion. This request is made in good faith and with no intention to unduly delay the
6 proceedings, and counsel apologizes for any inconvenience.

7 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
8 motion.

9 It is therefore respectfully requested that Defendant be granted an extension of time to respond
10 to Plaintiff's Motion for Reversal and Remand, through and including February 13, 2024.

11
12
13 Dated: January 11, 2024

Respectfully submitted,

14 JASON M. FRIERSON
United States Attorney

15 /s/ Michael J. Mullen
16 MICHAEL J. MULLEN
Special Assistant United States Attorney

17
18
19 IT IS SO ORDERED:

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: January 12, 2024

CERTIFICATE OF SERVICE

I, Michael J. Mullen, certify that the following individual(s) were served with a copy of the foregoing **DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

By CM/ECF:

MARC V. KALAGIAN
marc.kalagian@rksslaw.com

Dated: January 11, 2024

/s/ Michael J. Mullen
MICHAEL J. MULLEN
Special Assistant United States Attorney